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September 20, 2024

**BY ECF**

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Tsani Russell*,  
19 Cr. 554 (NRB)

Dear Judge Buchwald:

This letter is submitted on behalf of defendant Tsani Russell, whom I represent in the above-entitled case, and, for the reasons set forth below, respectfully requests that the hearing on his Violation of Supervised Release (“VOSR”), currently scheduled for next Tuesday, September 24, 2024, at 12:30 p.m., be adjourned until November 26, 2024, the date proposed after consultation with Chambers. I have been in contact with Assistant United States Attorney Jeffrey C. Coffman, and U.S. Probation Officers Stephanie Zhang and Evan Lawrence and they have informed me the government and probation do not object to this application, though probation has not yet responded as to the proposed date.

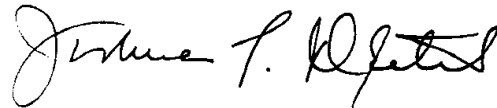
Mr. Russell’s New York State criminal case – the underlying basis for the VOSR – has been adjourned until November 1, 2024. As a result, it does not appear that the parties can accomplish anything prior to next week’s scheduled conference. However, my understanding is that the parties in the state case are engaged in a plea negotiation and should arrive at a resolution in the near future. Thus, a court date in the VOSR proceeding on November 26, 2024, would be more efficient in reaching a resolution of the VOSR.

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Hon. Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
September 19, 2024  
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Accordingly, it is respectfully requested the September 24, 2024, VOSR hearing be adjourned until November 26, 2024.

Respectfully submitted,



Joshua L. Dratel

JLD/

**So ordered. Adjournment granted  
until November 26, 2024 at 11:00  
a.m.**



NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: September 23, 2024  
New York, New York